

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JOHN BOUCHER,

Plaintiff,

v.

Case No. 18-CV-0760

DR. MARTIN AND DEBRA TIDQUIST,

Defendants.

DEFENDANTS' EXPERT WITNESS DISCLOSURE

Defendants, by their attorneys, Attorney General Joshua L. Kaul and Assistant Attorney General Sandy Tarver, disclose the following experts who may testify at trial, consistent with the Court's Amended Scheduling Order (Dkt. 19):

1. Paul Bekx, M.D. is a Director at the Department of Corrections, Bureau of Health Services. He is retained or specifically employed to provide expert testimony and his report for this case will be disclosed on or before November 15, 2019, pursuant to the Court's Amended Scheduling Order (Dkt. 19). He may testify about Mr. Boucher's medical conditions and the health care and treatment provided to Mr. Boucher's during times relevant to this lawsuit, consistent with relevant excerpts of Mr. Boucher's medical record.

2. Debra Tidquist is a Nurse Practitioner at Jackson Correctional Institution. She is not retained or specifically employed to provide expert testimony and her duties do not regularly involve giving expert testimony. She may testify

about the health care and treatment provided to Mr. Boucher during times relevant to this lawsuit, consistent with relevant excerpts of Mr. Boucher's medical record.

3. Darin Krzyzanowski, DPT, is a physical therapist who is currently at Jackson Correctional Institution and at all times relevant to this lawsuit. He is not retained or specifically employed to provide expert testimony and his duties do not regularly involve giving expert testimony. He may testify about the health care and physical therapy treatments provided to Mr. Boucher during times relevant to this lawsuit, consistent with relevant excerpts of Mr. Boucher's medical record.

4. Any medical or health care personnel who treated plaintiff as disclosed in his medical record may be called upon to present testimony at trial concerning the care and treatment provided to the plaintiff and will testify as to the medical diagnoses, care and treatment provided to the plaintiff, as documented in the plaintiff's medical record.

Defendants reserve the right to rely upon an expert witness identified by any party to this action, regardless of whether the party remains in the case at the time of trial or ultimately calls the witness at trial.

Dated this 31st day of October, 2019.

Respectfully submitted,

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Attorney General of Wisconsin

s/Sandra L. Tarver
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